

**EXHIBIT A**

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Megan Thomas

Plaintiff,

vs.

City of Columbia

Defendants.

IN THE COURT OF COMMON PLEAS

Summons

(JURY TRIAL REQUESTED)

Docket: 2017-CP-40-

TO THE DEFENDANT(S) ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to the said Complaint on the undersigned attorneys at their offices at 1111 Church Street, Camden, South Carolina within thirty (30) days after the service hereof, exclusive of the day of such services; and if you fail to answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the Complaint.

SAVAGE, ROYALL & SHEHEEN, L.L.P.

By:

Vincent A. Sheheen  
Post Office Drawer 10  
1111 Church Street  
Camden, South Carolina 29020  
(803) 432-4391

September 11, 2017





*(Sex Discrimination-Harassment, Pregnancy)*

5. Plaintiff was hired with the City of Columbia Metropolitan Wastewater Treatment Plant.
6. Within the first weeks of employment, Plaintiff's co-worker, Travis Brazell, began making sexual advances toward her. Brazell made demeaning comments toward Plaintiff and constantly and oppressively commented on her appearance and desirability.
7. Eventually, the situation with Brazell escalated into him reaching underneath Plaintiff's hem and feeling her leg. In the coming weeks, Brazell began to explicitly talk about Plaintiff's breasts, hips, and buttocks.
8. Brazell continued to comment and harass Plaintiff about her body making such lewd comments in front of supervisors, Keith Collinsworth and Jim Collins. No actions were taken to protect Plaintiff or halt the harassment.
9. Both Collinsworth and Brazell told Plaintiff that she owed her job to them and Collinsworth also began speaking in vulgar manners to Plaintiff.
10. A co-worker, Jerry Driggers, advised Plaintiff that she should file a Complaint with the employer. Plaintiff filed a Complaint through Jim Collins.
11. After reporting the abuse, Plaintiff was advised by the Employer that she should not mention her complaints to anyone and that she should lock herself into an office whenever Brazell was harassing her.
12. Employer subsequently informed other employees about Plaintiff's complaints of sexual harassment and she began to be isolated by her fellow employees.

13. Upon information and belief, Collinsworth also made vulgar remarks about Plaintiff and told others that Plaintiff was a problem employee because of her complaints of harassment.
14. More harassment continued and was not remedied by Employer even after being put on notice in many ways. Instead, Plaintiff was isolated further in her employment. Furthermore, supervisors at Employer's business made negative references regarding Plaintiff's complaints to other employees and to Plaintiff to retaliate against Plaintiff and make the workplace even more hostile.
15. After making complaints, Plaintiff began to receive negative work performance reviews and comments, although she had never had performance issues noted prior to making complaints. In November of 2016, Plaintiff notified Employer that she was pregnant. Employer refused to allow any accommodations normally allowed to employees and forced Plaintiff to resign her employment because of her pregnancy and in further retaliation against her.

#### **FOR A SECOND CAUSE OF ACTION**

##### ***(Retaliation)***


16. Each and every allegation stated above is restated as if repeated herein.
17. Upon information and belief, Defendant took detrimental employment actions against Plaintiff because she reported the sex discrimination and violations of Title VII, including eventual termination of employment.
18. Upon information and belief, Defendant's actions violate the anti-retaliation provisions of Title VII and an administrative Complaint was filed with the S.C. Human Affairs Commission and a right to sue letter was issued.




19. Plaintiff has suffered injuries from Defendant's actions including emotional distress, lost wages, and lost income and is entitled to all recoverable damages allowed under Title VII.

WHEREFORE, the Plaintiff prays the Court to return a verdict in her favor with actual, statutory and punitive damages as a jury finds appropriate; for the costs and attorneys fees of this action; and for such further relief as this Court deems just.

11<sup>th</sup> day of September, 2017.

  
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ATTORNEYS FOR PLAINTIFF

Megan Thomas v. City of Columbia

CERTIFICATE OF SERVICE

I, the undersigned, an employee of Savage, Royall & Sheheen, L.L.P. do hereby certify that I have served the foregoing Summons & Complaint by depositing a copy of same in a United States Postal Mailbox, postage prepaid, certified return receipt, addressed to the party below, on the 11th day of September, 2017.

City of Columbia  
Teresa Wilson, City Manager  
PO BOX 147  
Columbia, SC 29217

  
Autumn N. Furniss  
Legal Assistant for Vincent A. Sheheen  
1111 Church Street  
Post Office Drawer 10  
Camden, SC 29020  
(803) 432-4391

SWORN to before me this 11<sup>th</sup> day  
of September, 2017.

  
Nancy M. Richbourg  
Notary Public for South Carolina  
My Commission Expires: 9/22/18



## STATE OF SOUTH CAROLINA

COUNTY OF RichlandMeagan Thomas

Plaintiff(s)

vs.

City of Columbia

Defendant(s)

Submitted By: Vincent A. Sheheen, EsqAddress: 1111 Church StreetPO Drawer 10Camden, SC 29201SC Bar #: 11552Telephone #: 803-432-4391Fax #: 803-425-4812

Other:

E-mail: vsheheen@thesavagefirm.com

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint.

## DOCKETING INFORMATION (Check all that apply)

\*If Action is Judgment/Settlement do not complete

- ☒ JURY TRIAL demanded in complaint. ☐ NON-JURY TRIAL demanded in complaint.
- ☐ This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- ☒ This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- ☐ This case is exempt from ADR. (Proof of ADR/Exemption Attached)

## NATURE OF ACTION (Check One Box Below)

- |  |  |   |   |
|--|--|---|---|
| <b>Contracts</b><br><input type="checkbox"/> Constructions (100)<br><input type="checkbox"/> Debt Collection (110)<br><input type="checkbox"/> General (130)<br><input type="checkbox"/> Breach of Contract (140)<br><input type="checkbox"/> Fraud/Bad Faith (150)<br><input type="checkbox"/> Failure to Deliver/Warranty (160)<br><input checked="" type="checkbox"/> Employment Discrim (170)<br><input type="checkbox"/> Employment (180)<br><input type="checkbox"/> Other (199) | <b>Torts - Professional Malpractice</b><br><input type="checkbox"/> Dental Malpractice (200)<br><input type="checkbox"/> Legal Malpractice (210)<br><input type="checkbox"/> Medical Malpractice (220)<br>Previous Notice of Intent Case #<br>20 -NI-<br><input type="checkbox"/> Notice/ File Med Mal (230)<br><input type="checkbox"/> Other (299)   | <b>Torts - Personal Injury</b><br><input type="checkbox"/> Conversion (310)<br><input type="checkbox"/> Motor Vehicle Accident (320)<br><input type="checkbox"/> Premises Liability (330)<br><input type="checkbox"/> Products Liability (340)<br><input type="checkbox"/> Personal Injury (350)<br><input type="checkbox"/> Wrongful Death (360)<br><input type="checkbox"/> Assault/Battery (370)<br><input type="checkbox"/> Slander/Libel (380)<br><input type="checkbox"/> Other (399)   | <b>Real Property</b><br><input type="checkbox"/> Claim & Delivery (400)<br><input type="checkbox"/> Condemnation (410)<br><input type="checkbox"/> Foreclosure (420)<br><input type="checkbox"/> Mechanic's Lien (430)<br><input type="checkbox"/> Partition (440)<br><input type="checkbox"/> Possession (450)<br><input type="checkbox"/> Building Code Violation (460)<br><input type="checkbox"/> Other (499)   |
| <b>Inmate Petitions</b><br><input type="checkbox"/> PCR (500)<br><input type="checkbox"/> Mandamus (520)<br><input type="checkbox"/> Habeas Corpus (530)<br><input type="checkbox"/> Other (599)   | <b>Administrative Law/Relief</b><br><input type="checkbox"/> Reinstate Drv. License (800)<br><input type="checkbox"/> Judicial Review (810)<br><input type="checkbox"/> Relief (820)<br><input type="checkbox"/> Permanent Injunction (830)<br><input type="checkbox"/> Forfeiture-Petition (840)<br><input type="checkbox"/> Forfeiture-Consent Order (850)<br><input type="checkbox"/> Other (899) | <b>Judgments/Settlements</b><br><input type="checkbox"/> Death Settlement (700)<br><input type="checkbox"/> Foreign Judgment (710)<br><input type="checkbox"/> Magistrate's Judgment (720)<br><input type="checkbox"/> Minor Settlement (730)<br><input type="checkbox"/> Transcript Judgment (740)<br><input type="checkbox"/> Lis Pendens (750)<br><input type="checkbox"/> Transfer of Structured Settlement Payment Rights Application (760)<br><input type="checkbox"/> Confession of Judgment (770)<br><input type="checkbox"/> Petition for Workers Compensation Settlement Approval (780)<br><input type="checkbox"/> Other (799) | <b>Appeals</b><br><input type="checkbox"/> Arbitration (900)<br><input type="checkbox"/> Magistrate-Civil (910)<br><input type="checkbox"/> Magistrate-Criminal (920)<br><input type="checkbox"/> Municipal (930)<br><input type="checkbox"/> Probate Court (940)<br><input type="checkbox"/> SCDOT (950)<br><input type="checkbox"/> Worker's Comp (960)<br><input type="checkbox"/> Zoning Board (970)<br><input type="checkbox"/> Public Service Comm. (990)<br><input checked="" type="checkbox"/> Employment Security Comm (991)<br><input type="checkbox"/> Other (999) |
| <b>Special/Complex/Other</b><br><input type="checkbox"/> Environmental (600)<br><input type="checkbox"/> Automobile Arb. (610)<br><input type="checkbox"/> Medical (620)<br><input type="checkbox"/> Other (699)<br><input type="checkbox"/> Sexual Predator (510)<br><input type="checkbox"/> Permanent Restraining Order (680)   | <input type="checkbox"/> Pharmaceuticals (630)<br><input type="checkbox"/> Unfair Trade Practices (640)<br><input type="checkbox"/> Out-of-State Depositions (650)<br><input type="checkbox"/> Motion to Quash Subpoena in an Out-of-County Action (660)<br><input type="checkbox"/> Pre-Suit Discovery (670)  |   |   |

Submitting Party Signature: \_\_\_\_\_

Date: 9-11-17

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRPC, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.